PROGRAM INTEGRITY REQUEST FOR REGULATION INTERPRETATION

INSTRUCTIONS: Complete items 1 -10 of the form. Use a separate form for each policy interpretation request. Retain a copy of the Word Document for your records, and submit via email to: PIBPolicy@dss.ca.gov.

1. REQUESTOR NAME:	5. COUNTY:
Carlos A. Gonzales	Marin
2. PHONE NO: (415) 473-7081	6. SUBJECT:
EMAIL: cagonzales@marincounty.org	Calculating Overissuance for National Prisoner Match
3. REGULATION CITE(S):	7. REFERENCES: (ACLs/ACINs, COURT CASES Etc.)
	ACL 12-25E, ACL 18-20
4. DATE OF REQUEST:	8. DATE RESPONSE NEEDED:
06/01/2017	06/30/2017

- 9. QUESTION: (INCLUDE SCENARIO IF NEEDED FOR CLARITY):
- 1. National Prisoner's Match (NPM) When a client has been incarcerated for more than 30 days (ie. 4 months) can an Overissuance (OI) be calculated based on the period of confinement?

10. REQUESTOR'S PROPOSED ANSWER:

An OI would be established from the month that the SAR7 was due; client should have reported on the SAR7. If it is a change reporting household, the change would need to be reported 10 days from the date of the move. OI would then occur from the month after their 10 days has expired.

11. CDSS RESPONSE:

An OI cannot be established for the months after the client failed to report incarceration, unless the client failed to report the incarceration on their SAR 7. A NPM is not Verified Upon Receipt (VUR) and incarceration is not a mandatory mid-period reporting requirement (All County Letter 12-25E), thus an OI cannot be established for the period of confinement. Furthermore, ACL 18-20 provides guidance on processing certain data matches, such as the NPM, with unclear information.

PROGRAM INTEGRITY ANALYST:	APPROVING MANAGER:
Michael Lee	Gerica Jones
DATE:	DATE: // ,
04/03/2018	V 4/3/8

DATE RESPONSE RECEIVED/LOG # (CDSS Use Only):

6/22/17 - PI 17-33A

Please note: The policies expressed in this response are based on the unique set of facts presented and should not be presumed to apply in other situations.